

## **APPENDIX C**

### **SIX STEPS TO ESTABLISHING A HOTLINE AND REPORTING AND TRACKING SYSTEM**



## Introduction

A complaint hotline is a dedicated phone number or website where citizens can easily report illicit discharge and pollution concerns. A prompt investigation of each complaint by trained inspectors should always follow a reported incident, usually within 24 hours. Many Phase I communities utilize hotlines to track down intermittent and transitory discharges, and regard them as one of their most effective tools to isolate illicit discharges (CWP, 2002).

This appendix describes the six steps needed to establish a hotline to report and track illicit discharges.

### Step 1. Define the scope

The community must first determine its need for an IDDE complaint hotline and should not establish one simply because it does not currently exist. An IDDE hotline may be appropriate for a community for the following reasons:

- The municipality already receives a high volume of complaint calls associated with illicit discharges. Without a designated number, complaints may be received by several different departments, which can lead to inconsistent handling of concerns. If a community is unsure of the number of complaints received across the municipality, it may want to quickly survey departments likely to receive calls. A hotline can help promote stakeholder reporting of incidents and make the reporting process more efficient rather than relying on calls making it to the correct office.

- A community hotline exists that cannot be altered to accommodate the needs of the IDDE program. Situations that would make two hotlines incompatible include: significantly different concerns (e.g., IDDE vs. emergency services); varying jurisdictional limits (e.g., regional vs. city only); and funding restrictions (e.g., hotline is developed with a grant that prevents it from overlapping with other programs).
- Related municipal programs exist that would benefit from the establishment of a hotline, such as erosion and sediment control or storm water management programs. Combining similar services can lead to a significant savings in cost and time.

Communities that have no pressing need for a hotline may still choose to institute a department phone number or email address to field complaints and incident reports during normal business hours, or a website that provides guidance on how to report potential illicit discharges.

Once a community has decided to implement a hotline, the scope of the IDDE hotline should be defined, including the intent and extent of the program. The intent of the hotline may be to process the incident/complaint, and investigate and enforce violations, or to take a more educational approach that also provides information and guidance. It is recommended that communities initiating a hotline for the first time limit the scope to the former intent.

The extent of the hotline refers to the geographic area of coverage as well as the types of incidents that fall under the responsibility of the responding agency or department. Often hotlines are restricted to

one specific jurisdiction to minimize complications with investigating and enforcing violations across jurisdictional lines. Significant coordination and planning are required if the hotline is intended to serve a region or watershed with several jurisdictions. Similar coordination efforts are necessary if a wide range of incidents is handled by the hotline that require multiple agencies or departments to respond. It is important for communities to predetermine what agency or department is best suited and trained to respond to specific incident reports, and for all hotline operators to be well trained and knowledgeable about these distinctions.

## **Step 2. Create a tracking and reporting system**

The next step to establishing an IDDE hotline is to create a tracking and reporting system. The two key features that should be considered are the methods of reporting and methods of responding.

At a minimum, the reporting method should include a telephone call-in system and may also include a website. The phone number and/or internet address should be easy to remember and toll-free if any areas under the jurisdiction of the IDDE program are long-distance from the reporting office. The reporting method should be available 24 hours a day, seven days a week. This around the clock process encourages stakeholders to call as soon as a problem is identified.

Providing an option for anonymous reporting also encourages calls because it can be done without fear of retribution from neighbors, employers, or others. In most cases this is achieved by providing an “Incident ID” that may also be used to allow the caller to track the investigation and know that their concerns are being

addressed, as well as build in accountability within the department to respond to hotline callers.

The level of detail collected during an incident report will vary depending on system design and complaint responder training. Many hotlines collect only basic information, however, more detailed information will help prioritize investigations and take advantage of a database system to expand reporting options. A sample Illicit Discharge Incident Tracking Sheet is provided at the end of this Appendix to help facilitate this process. The sheet is intended for use with a phone reporting system, and is designed so that the responder can prompt the caller through each section. This sheet may be modified into a simple, multiple-choice questionnaire if reporting is done through a website or email. The basic information collected during an incident report is described below.

- *Incident ID* - Each incident should receive a unique identification code to ensure accurate tracking and public feedback.
- *Reporter Information* - Reporter contact information may be recorded, however, anonymous reporting is often preferred because it frees the reporter from potential backlash. The date and time of incident must be noted, as it may be different than the time it was called in.
- *Responder Information* - The name of the responder and the time and date of the call should be recorded. The amount of precipitation in the past 24-48 hours is also recorded for reporting purposes.
- *Incident Location* - The location of the potential illicit discharge is one of the most important yet difficult pieces of information to accurately collect. Unique

and visible outfall numbering allows reports to be precisely located. In the absence of outfall IDs, callers should be encouraged to provide the nearest street/intersection information and any general descriptions that tie the site to a nearby landmark or major land use (e.g., shopping center, school, etc.), as well as indicate whether the incident site is located in the stream corridor or in an upland area. Other options are to include blank space for narrative descriptions or for the response team to meet the caller at a nearby known location if the caller cannot provide sufficient locational information.

- *Problem Type* - Providing a list of likely problems and problem descriptions can help to readily identify the potential source. The problem types will likely fall into the following five categories: unnatural stream conditions, sewage, wash water, oil/solvents, and industrial wastes. “Other” should also be included, as exceptions will occur. By identifying a suspected origin, the field team may have a head start on the investigation and suspected repeat offenders can be screened through trend analysis.
- *Problem Indicator Description* - A description of the discharge odor and color, and type of floatables present permits investigators to know what they are looking for and start preparing for how to handle the situation.
- *Investigation Notes* - To properly track and report suspected illicit discharges, the investigation needs to be documented. Key information to record for the initial and follow-up investigation (if applicable) include: date, time, step taken to respond to incident report (not all require follow

up), investigators, length of time spent for investigation, corrective actions taken, date case closed, and any other pertinent information.

Due to the intermittent nature of illicit discharges, a 24-hour investigation response can increase the likelihood of identifying and eliminating problems. While some problems require more immediate attention than others, investigators should always respond as soon as appropriate. Calls should be screened by a “live” person so only the most urgent calls are passed through a pager system in order to minimize the pressure that 24-hour response places on investigators at odd hours. The complaint questions should be detailed enough to help support this basic prioritization.

Some communities may determine that 24-hour response is cost prohibitive, and that non-emergency response will only occur during normal working hours (e.g., 8AM - 5PM). In these situations, it is essential that explicit instructions be provided to the caller in case of a true emergency.

Another aspect of responding to complaints is determining when another department or agency should handle the problem. An incident may need to be passed on because the reported problem falls under the responsibility of another department, such as the fire or health department. Having specific guidelines for the call responder and investigators is imperative to handling these incidents appropriately.

### **Step 3. Train personnel**

Training of complaint respondents should include how to provide good customer service, the basics of illicit discharge identification and details of the tracking and reporting process. The responder should be

trained so that he/she understands the significance of the information being collected and can go beyond the “check boxes” when necessary to answer the reporter questions, as well as guide the caller through the data collection process. This ensures that the incident is handled correctly, and that the caller feels that the concern is in good hands.

An initial screening of the potential illicit source by the responder can be useful. Table C1 provides a list of descriptions of common illicit discharges called in and the likely source or situation.

Inter- and intra-department training should focus on the importance of IDDE, the complaint hotline investigation and tracking process, and the expected responsibilities of each involved entity. Such training can greatly increase watershed wide awareness of illicit discharge problems and is essential to developing good working relationships with other departments.

#### Step 4. Advertise

Public relations are an important aspect of a pollution hotline. Many municipalities have noted that there is always a peak in incident reporting following an advertising campaign. Advertising the hotline phone number or web address several times a year keeps the message fresh in public minds. Effective methods include magnets, stickers, phone book advertisements, flyers, bill inserts, displays, fair booths and newspaper articles.

Advertising, including publicizing success stories about the hotline serves several purposes. First it highlights the responsiveness of the program to the general public. Second, it serves as a means to further promote the hotline. Third, it builds public support for the program and fosters public stewardship. Success stories can be published through newspaper articles, TV broadcasts or other highly visible means of advertising. The stories will build general awareness of illicit discharge issues and promote greater public stewardship and accountability by both those reporting the problems and potential violators.

Table C1: Types of Potential IDDE Hotline Complaints	
Typical Call-in Indicators	Likely Source
Sewage smell, or floatables from storm drain outfall during dry weather flow	Storm and sanitary sewer cross-connection
Small (<6" diameter) pipe directly discharging to receiving water	Straight pipe discharge from home or business
Greatly discolored or unnatural smelling liquid (often hydrocarbons) flowing from or pooling on property or from outfall below property	Dumping
Sewage smell; extra green vegetation; saturated ground	Failing septic system
Muddy water; sediment deposits, up stream construction site	Poor erosion and sediment control

### Step 5. Respond to complaints

Hotline customer service staff should provide friendly and knowledgeable service to callers that might include an overview of the investigation process, how long a response should take, and an incident tracking ID so the caller can follow-up on the complaint. Hotline staff should arrange to send an investigator out to the incident site as soon as possible.

Investigators should respond to complaints in a timely manner, and provide the necessary feedback to the database system. The type of complaint will dictate the necessary response, as well as the timing of the response (e.g., a failing septic system may not be as high a priority as a sanitary sewer overflow). Information submitted to the reporting database might include: time from initial call to investigation, steps taken to investigate, and actions taken to solve the problem.

### Step 6. Track incidents

Illicit discharge complaints and incidents should be reported and tracked through a database system in order to meet the following program goals:

- Identify recurring problems and suspected offenders
- Measure program success
- Comply with annual report requirements

Basic data to be compiled and analyzed include the following:

- Number of calls received per year
- Number of incidents investigated
- Number of actual IDDE incidents
- Average time to follow up on incident report
- Average time to remedy identified illicit problem
- Most common problems identified by public

### Costs

Table C2 provides planning level costs to establish and maintain a hotline and tracking system. Certain costs can undoubtedly be reduced through sharing of services across departments and even jurisdictions.

Table C2: Cost to Create and Maintain a Successful IDDE Hotline			
Steps	Key Elements/ Consideration	Initial Costs	Annual Costs
1. Define the scope	Planning Costs: 60 hrs @ \$25/hr to coordinate with other departments and design program basics	\$1,500	\$0
2. Create a tracking and reporting system	Initial web design: 80hrs @ \$25/hr Annual web hosting @ 200/yr <sup>1</sup>	\$2,000	\$200
	800 toll free number set-up: free Monthly costs: \$20/month (\$240/yr) + \$0.20 per minute (assume average call of 10 minutes and 1000 calls/yr, or \$2,000/yr) <sup>2</sup>	\$0	\$2,240
	Database design: 20 hrs @ \$25/hr <sup>1</sup>	\$500	\$0
3. Train personnel	<i>Initial:</i> 3 days (Approx \$25/hr) including full day introductory Access training course (\$400) = \$1,000 <sup>3</sup> <i>Annual:</i> approx 1/2 day refresher = \$200	\$1,000	\$200
	<i>Initial:</i> presentation prep (24 hrs @ \$50/hr) <i>Annual:</i> mini-refresher training (16 hrs @ \$25/hr to rotate through other departments)	\$1,200	\$800
4. Advertise	<i>Initial:</i> Design brochure and magnets (\$1,000) <sup>4</sup> ; Design 30 second PSA video spot (\$500) <sup>5</sup> <i>Annual:</i> 4,000 magnets (\$920), 10,000 brochures printed and mailed (\$1,500) + 20 hrs or coordination (\$500)	\$1,500	\$2,920
5. Respond to complaints	Assumes 1,000 calls per year at 10 min per complaint <sup>6</sup> to handle including receiving the call, forwarding to appropriate place, logging into a database, and tracking investigation. This time represents approximately 15% of a full time position.	\$0	\$5,000
6. Track incidents			
TOTAL		\$7,700	\$11,360
Ways to reduce cost: Use in-house or donated database, brochure and web design services; combine with other pollution prevention hotlines (e.g., storm water); combine with other local, regional or state IDDE hotline programs; use existing web page hosting services; hire staff with database experience			
Notes:			
<sup>1</sup> Personal communication with Center for Watershed Protection staff performing similar duties			
<sup>2</sup> Sprint Small Business website			
<sup>3</sup> ExecuTrain - computer training business			
<sup>4</sup> CWP, 1998			
<sup>5</sup> CSG, 1998			
<sup>6</sup> adapted from TCEQ, 2003			



## References

Center for Watershed Protection (CWP). 1998. *Rapid Watershed Planning Handbook – A Comprehensive Guide for Managing Urbanizing Watersheds*. Ellicott City, MD.

Center for Watershed Protection. 2002. Unpublished Task I Technical Memorandum in Support of *Illicit Discharge Detection and Elimination Guidance Manual*. Ellicott City, MD.

Council of State Governments (CSG). 1998. *Getting in Step: A Guide to Effective Outreach in Your Watershed*.

Sprint Small Business web site ([www.sprintbiz.com](http://www.sprintbiz.com)). Accessed May 14, 2003.

Texas Commission of Environmental Quality (TCEQ) Personal Communication. May 9, 2003. Email Jim Reed.



## Illicit Discharge Hotline Incident Tracking Sheet

<b>Incident ID:</b>				
<b>Responder Information</b>				
Call taken by:			Call date:	
Call time:			Precipitation (inches) in past 24-48 hrs:	
<b>Reporter Information</b>				
Incident time:			Incident date:	
Caller contact information ( <i>optional</i> ):				
<b>Incident Location</b> ( <i>complete one or more below</i> )				
Latitude and longitude:				
Stream address or outfall #:				
Closest street address:				
Nearby landmark:				
<b>Primary Location Description</b>		<b>Secondary Location Description:</b>		
<input type="checkbox"/> Stream corridor ( <i>In or adjacent to stream</i> )	<input type="checkbox"/> Outfall	<input type="checkbox"/> In-stream flow	<input type="checkbox"/> Along banks	
<input type="checkbox"/> Upland area ( <i>Land not adjacent to stream</i> )	<input type="checkbox"/> Near storm drain	<input type="checkbox"/> Near other water source (storm water pond, wetland, etc.):		
Narrative description of location:				
<b>Upland Problem Indicator Description</b>				
<input type="checkbox"/> Dumping	<input type="checkbox"/> Oil/solvents/chemicals	<input type="checkbox"/> Sewage		
<input type="checkbox"/> Wash water, suds, etc.	<input type="checkbox"/> Other: _____			
<b>Stream Corridor Problem Indicator Description</b>				
Odor	<input type="checkbox"/> None	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rancid/Sour	<input type="checkbox"/> Petroleum (gas)
	<input type="checkbox"/> Sulfide (rotten eggs); natural gas	<input type="checkbox"/> Other: Describe in "Narrative" section		
Appearance	<input type="checkbox"/> "Normal"	<input type="checkbox"/> Oil sheen	<input type="checkbox"/> Cloudy	<input type="checkbox"/> Suds
	<input type="checkbox"/> Other: Describe in "Narrative" section			
Floatables	<input type="checkbox"/> None:	<input type="checkbox"/> Sewage (toilet paper, etc)	<input type="checkbox"/> Algae	<input type="checkbox"/> Dead fish
	<input type="checkbox"/> Other: Describe in "Narrative" section			
Narrative description of problem indicators:				
Suspected Violator (name, personal or vehicle description, license plate #, etc.):				

Investigation Notes	
Initial investigation date:	Investigators:
<input type="checkbox"/> No investigation made	Reason:
<input type="checkbox"/> Referred to different department/agency:	Department/Agency:
<input type="checkbox"/> Investigated: No action necessary	
<input type="checkbox"/> Investigated: Requires action	Description of actions:
Hours between call and investigation:	Hours to close incident:
Date case closed:	
Notes:	